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December 22, 2021

VIA CM/ECF

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
844 North King Street, Unit 26, Room 6124
Wilmington, DE 19801-3555

Re: *Thomson Reuters Enterprise Centre GmbH et al. v. ROSS Intelligence Inc.*,
Case No. 1:20-cv-00613 (D. Del.)

Dear Judge Stark:

The parties in the above-referenced matter write to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on December 16, 2021.

- Delaware Counsel for Plaintiffs: Michael Flynn
- Lead Counsel for Plaintiffs: Joshua Simmons, Megan McKeown, Eric Loverro
- Delaware Counsel for Defendant: Stephanie E. O'Byrne
- Lead Counsel for Defendant: Warrington S. Parker III, Crinesha B. Berry

The dispute requiring judicial attention is as follows:

- ROSS moves to compel Plaintiffs to produce documents responsive to its:
 1. RFP Nos. 1, 3-4 (settlement agreements with third parties)
 2. RFP Nos. 48-54 (license agreements and Plaintiffs' interpretation of their license agreements, related to Westlaw)
 3. RFP Nos. 57-65 (contracts with judicial entities)
- ROSS moves to compel Plaintiffs to produce documents within the last 20 years, limited to the Requests above.

Due to the holiday season, and to the extent it is agreeable with the Court, the parties propose the following briefing schedule:

Initial Letter (Defendant) – 01/05/2022

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Responsive Letter (Plaintiffs) – 01/10/2022

Respectfully,

/s/ Stephanie E. O'Byrne

Stephanie E. O'Byrne

SEO:nmt/7529582/50241

cc: Counsel of record (via electronic mail)